



# California Regional Water Quality Control Board

## Santa Ana Region



Terry Tamminen  
Secretary for  
Environmental  
Protection

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Arnold Schwarzenegger  
Governor

M60050\_003844  
MCAS EL TORO  
SSIC NO. 5090.3.B

September 13, 2004

Base Realignment and Closure  
Attn: Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, CA 92618

### COMMENTS ON DRAFT FINAL WORK PLAN, PRE-DESIGN EVALUATION OF NATURAL ATTENUATION AT IRP SITE 16, CRASH CREW TRAINING PIT No. 2, FORMER MARINE CORPS AIR STATION, EL TORO


Dear Mr. Piszkin:

We have reviewed the above referenced document, dated July 16, 2004, which we received on July 19, 2004. We have the following comments:

- We remain concerned on your commitment to an appropriate demonstration period and current proposal period of natural attenuation evaluation.
- Section 1, Introduction, Page 1-1, Second paragraph: The pilot test is identified as significantly reducing volatile organic compound (VOC) concentrations. You further state that the evaluated presumptive remedy, multiphase extraction (MPE), was ineffective for groundwater cleanup. These are conflicting statements. It is possible that the evaluation determined that application of the technology was not cost effective or efficient. When you counter that significant VOC concentrations were removed during the evaluation period, MPE technology should not be defined as ineffective.

For any questions, please call me at (951) 782-4494, or send email to [jbroderic@rb8.swrcb.ca.gov](mailto:jbroderic@rb8.swrcb.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via e-mail: Ms. Nicole Moutoux, US EPA, Region 9  
Mr. Tayseer Mahmoud, DTSC, Office of Military Facilities  
Mr. Marc Smits, NAVFACENGCOM, Southwest Division

*California Environmental Protection Agency*

received  
9/15/04